

# EXHIBIT 318

MARGARITA BENJAMIN 30(b)(6)  
GOVT OF U.S. VI vs JP MORGAN CHASE

July 14, 2023

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1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES )  
6 VIRGIN ISLANDS, )

7 Plaintiff, )

8 VS. )

9 JP MORGAN CHASE BANK, N.A., )

10 Defendant. )

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14  
15 VIDEO RECORDED DEPOSITION OF

16 MARGARITA BENJAMIN

17 FRIDAY, JULY 14, 2023

18  
19  
20 REPORTED BY:

21 DENISE D. HARPER-FORDE  
22 Certified Shorthand Reporter (CSR)  
23 Certified RealTime Reporter (CRR)  
24 Certified LiveNote Reporter (CLR)  
25 Registered Professional Reporter (RPR)  
Notary Public (FLORIDA)

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1 Ackerman, Motley Rice for the  
2 Government of the U.S. Virgin Islands  
3 and the witness.

4 (Witness sworn)

5 DIRECT EXAMINATION

6 (BY ATTORNEY NEIMAN):

7 Q. Good morning, Ms. Benjamin.

8 A. Good morning.

9 Q. How are you employed?

10 A. Could you repeat?

11 Q. Oh, I'm sorry. I speak fast  
12 sometimes. I apologize.

13 Where do you work?

14 A. I work with the Virgin Islands  
15 Economic Development Authority in the  
16 Virgin Islands Economic Development  
17 Commissions Division.

18 Q. And what is your job?

19 A. I am presently the managing  
20 director of Economic Development.

21 Q. How long have you been in that  
22 position?

23 A. I have been in that position  
24 since 2019.

25 Q. All right. And you understand

1 that you are here to testify on behalf  
2 of the Government of the U.S. Virgin  
3 Islands?

4 A. Yes, I do.

5 Q. Okay. And the topic that  
6 you're testifying about is the  
7 Government's knowledge of Cecile de  
8 Jongh's employment with an  
9 Epstein-related organization. Do you  
10 understand that?

11 A. Yes, I do.

12 Q. Can you tell me what the  
13 Government's knowledge was in the time  
14 period 2000 to 2019 about Ms. De  
15 Jongh's employment?

16 ATTORNEY ACKERMAN: Object to  
17 form. You can answer.

18 THE WITNESS: Right. I can --  
19 I can speak for specific government  
20 and not the overall government. But  
21 it was widely known that Cecile de  
22 Jongh was the Governor's wife. And in  
23 particular, being a part of our  
24 program, she would engage with several  
25 different government agencies.

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1                   For instance, the Department  
2                   of Corporations, the Division of  
3                   Corporations, that's where they would  
4                   file their corporate annual reports.  
5                   And so it was known, of course by  
6                   record, she -- her -- she was listed  
7                   in those reports that she was also  
8                   working for the company.

9                   Q.   For which company?

10                  A.   For Financial Trust.

11                  Q.   All right. Which was  
12                  Mr. Epstein's company?

13                  A.   Mr. Epstein's company, yes.

14                  Q.   Okay. So you've mentioned one  
15                  --

16                  A.   Right.

17                  Q.   -- place, the Division of  
18                  Corporations.

19                  What else?

20                  A.   Correct.

21                  And she was also -- would be  
22                  also engaging with the Bureau of  
23                  Internal Revenue. And so coming in  
24                  contact with any individuals in the  
25                  Bureau of Internal Revenue as a

1 manager for the company and speaking  
2 on behalf of any filings that were  
3 done, they will be able to recognize  
4 her.

5 It's important to note that  
6 she was publicly known as the wife, of  
7 course. Once he became Governor, she  
8 was part of the swearing-in ceremony  
9 that was advertised and was publicly  
10 shown. Generally everyone knew that  
11 she was his wife.

12 Those who would have come in  
13 contact with her as a cause of doing  
14 business would then recognize her as  
15 his wife relating to the business of  
16 Financial Trust.

17 Q. Okay. Any other government  
18 agencies that you're in a position to  
19 testify knew that Ms. --

20 A. Uh-huh.

21 Q. -- de Jongh was working for an  
22 Epstein-related organization?

23 A. The Department of Labor.

24 Q. Uh-huh. How did the  
25 Department of Labor know?

1           A. Those employees that were --  
2       had access specifically to the  
3       employment records would have known at  
4       that time. The CEO and in the  
5       management team would have known at  
6       that particular time.

7           Q. So, in fact, from --  
8       throughout the EDC's relationship with  
9       Mr. Epstein's companies, the senior  
10      management of the EDC would have known  
11      of Ms. de Jongh's affiliation with  
12      those companies?

13           ATTORNEY ACKERMAN: Object to  
14      form.

15           THE WITNESS: Yes. And it's  
16      important to note that in and about  
17      2012, everybody more or less knew  
18      because there was an article that was  
19      published that stated that she was  
20      working with the Financial Trust,  
21      Epstein's company.

22           (BY ATTORNEY NEIMAN):

23           Q. Okay. So certainly by 2012,  
24      it was widely known within the  
25      Government on the Virgin Islands that

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1 Ms. de Jongh was working for an  
2 Epstein-affiliated company?

3 A. Yes.

4 Q. How about within the  
5 Department of Justice of the Virgin  
6 Islands? Did you do anything to  
7 assess whether the Department of  
8 Justice of the Virgin Islands was  
9 aware that Ms. de Jongh was working  
10 for an Epstein-affiliated company?

11 A. I have no direct knowledge  
12 regarding the Department of Justice,  
13 just what was read throughout the  
14 depositions or throughout the  
15 newspaper --

16 Q. Okay.

17 A. -- regarding what was  
18 happening with the Department of  
19 Justice.

20 Q. And what did you learn from  
21 the newspapers?

22 A. That the then Attorney General  
23 Frazer was in communication with  
24 Cecile de Jongh regarding legislation  
25 that was being passed for sexual